

BellSouth Interconnection Services
Suite 200
1960 West Exchange Place
Tucker, Georgia 30084

Contact 770 492-7537
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Internet Address
Margaret.Garvin@bridge.bellsouth.com

Margaret T. Garvin
Sales Director
AT&T Regional Account Team

*FAX Rec'd
8-7-97*

Mr. Jim Hill
Negotiations & Implementation Manager
AT&T Room 12N13
1200 Peachtree St. N.E.
Atlanta, Georgia 30309

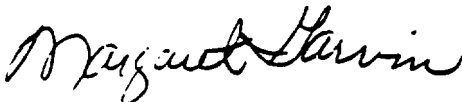
Dear Jim,

It is our understanding that the "Unbundled Network Elements Platform Electronic Data Interface Requirements" or Eyecharts, as you have referred to them, were developed by AT&T to assist you in building your requirements and relating those requirements to your systems developers. BellSouth does not use these eyecharts that you develop for our requirements, therefore we do not see that it is necessary for us to sign an agreement for your requirements.

We did agree to assist you in your efforts by reviewing your eyecharts, advising you of incorrect entries and answering questions to help you in completing the necessary ordering documents. In conversation on June 30, 1997, Marcia Moss concurred that the statements you had on your letter did correctly reflect some of the answers/issues addressed during the review of your eyecharts. However, it is inappropriate for BellSouth to sign an agreement based on your internal requirements documents and we will not do so.

Questions or comments may be directed to me at 770-492-7537.

Sincerely,



Margaret Garvin

cc: Al Calabrese
Pamela Nelson
Quinton Sanders
Terrie J. Hudson
Marcia Moss

ATTACHMENT 37k



James S. Hill
Negotiations & Implementation Manager

Room 12N13
Promenade II
1200 Peachtree St. NE
Atlanta, GA 30309
404 810-4929

August 25, 1997

Ms. Margaret Garvin
BellSouth Telecommunications, Inc.
Director
1960 West Exchange Place, Suite 200
Tucker, Georgia 30084

Margaret,

This is in response to your undated letter which was received on August 7, 1997 regarding BellSouth's reply to an AT&T letter dated June 27, 1997. In AT&T's letter, AT&T requested that the agreement between AT&T and BellSouth regarding the Electronic Data Interface Eyechart for Unbundled Network Elements Platform/Minus (UNE-P/M) be memorialized. This would be done by representatives from both companies signing the letter which confirmed concurrence on resolving issues between our companies.

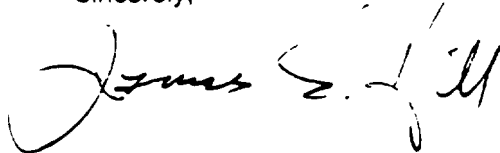
Although your letter states that BellSouth's "Marcia Moss concurred that the statements [in AT&T's letter] did correctly reflect some of the answers/issues addressed during the review of [the AT&T] eyecharts", your letter also claims that it is inappropriate for BellSouth to sign the agreement because requirements are internal to AT&T. You also stated that the eyecharts were developed by AT&T, and that BellSouth does not use these eyecharts for their requirements. Negotiations between our companies for system requirements were based on the eyecharts presented in the BellSouth Local Exchange Ordering Implementation Guide (LEO), Volume II dated April, 1997, tab labeled "Required Data Elements By Activity Type (Errors & Edits).

As a result of negotiations, AT&T believes that the UNE Platform/Minus Eyechart represents mutually agreed upon requirements necessary for AT&T to develop the electronic interface to BellSouth. Additionally, the business rules and requirements reflected in the eyecharts are used by both companies to drive system development and mapping to accomplish the administration of order flow between companies. An example of required system development in BellSouth is the absence of the "M" value for the field identifier "REQTYP" in the Local Service Request section of the LEO guide. While this capability is reflected in the BellSouth "Local Interconnection And Facility Based Ordering Guide", it is not in the LEO guide.

August 25, 1997

If your letter is intended to indicate that BellSouth is backing away from concurrence of answers/issues addressed in the eyechart negotiations, then AT&T must be notified immediately. Otherwise, because of the criticality to AT&T of the issues addressed in the June 27, 1997 letter, I ask that you confirm BellSouth's understanding by signing that letter and returning it to me by, August 29, 1997.

Sincerely,

A handwritten signature in black ink, appearing to read "James S. Hill". The signature is fluid and cursive, with the first name "James" being the most prominent.

Copy to: Al Calabrese
Pamela Nelson
Quinton Sanders
Terrie J. Hudson
Marcia Moss

ATTACHMENT 38

RECEIVED SEP 18 1997



Jill R. Williamson
Local Services Program Manager

Room 12255
Promenade I
1200 Peachtree St. NE
Atlanta, GA 30309
404 810-8562

September 16, 1997

Ms. Jo Sundeman
BellSouth Interconnection Services
Suite 410
1960 West Exchange Place
Tucker, Georgia 30084

Jo,

I received your voice mail today regarding what you described as BellSouth's new "edict" around testing and provisioning of the Unbundled Network Elements Platform (UNE-P) or as BellSouth refers to it, port/loop combinations. Your message stated that BellSouth no longer supports testing of UNE-P in any state except Kentucky and that BellSouth will not provision any UNE-P orders in any state except Kentucky.

This is in direct conflict with previous conversations and letters that have been exchanged between AT&T and BellSouth regarding our mutual agreement to test the ordering, provisioning and billing processes related to supporting UNE-P.

AT&T has spent a great deal of time preparing for the UNE-P test in Florida and is prepared to proceed forward with placing UNE-P orders with BellSouth the week of September 22, 1997. In preparation for the trial, we will be in Miami tomorrow, September 17, 1997, conducting training for our participants. In addition, all of our participants have ordered additional local lines into their homes and we have developed scenarios that our participants will follow during the testing.

I am very disappointed in this decision and do not want to waste the effort spent preparing for this test. In light of the fact that we have additional lines installed, participants trained and ready to initiate the test scenarios, I am requesting your agreement by the close of business Wednesday, September 17, 1997, to proceed with the Florida test. Along with this, I also would like a letter clarifying the change in BellSouth's position on UNE-P testing that you described in the voice mail message you left for me today.

Jill Williamson

cc: Jan Burriss
Pam Nelson
James Hill

ATTACHMENT 39

RECEIVED OCT 28 1997

A.J. Calabrese

Date 10-27-97

Log Code A4

257

cc: Beth
Gwen

10-27

October 24, 1997

To: Jim Carroll
Pam Nelson

From: Jan Burris

Subject: Ordering Interface Upgrade

The attached information is in response to your October 14, 1997, proposed project plan. BST is pleased to be able to meet many of your needs. With your concurrence, we will be delighted to work out the details in each area.

I have attempted to note on every line item in your proposal what concerns there are, if any, and categorize them in the four areas outlined below.

- . Legal/Regulatory Concerns
- . Standards Concerns
- . Scheduling/Timing Concerns
- . Need for more Clarity.

I will be happy to answer questions you may have regarding our response. I look forward to hearing from you and to discussing this mutual opportunity further. You may reach me at 770-482-7580.

Attachments

cc: Mark Feldler
Quinton Sanders

Current Operational Requirements:

BST provides several manual workarounds for AT&T today. BST plans to continue to support these workarounds as well as their efforts to help AT&T eliminate the need for said workarounds.

Note: There are no Legal/Regulatory issues. The Standards concerns revolve around the fact that many of the workarounds are created by the inability of AT&T's systems to provide the appropriate information/format to insure order flowthrough - to continue these workarounds after EDI-TCIF 7 is released would indicate that both AT&T and BST are out of standard. Timing is an issue in that both AT&T and BST expend additional manpower to handle/provide these manual workarounds, and neither company can redeploy said manpower until AT&T implements system/upgrades to handle the order flow process.

Electronic Rejects/Clerifications:

BST has agreed to make this capability available with EDI 7, Release 2. Because of the effort it will take to make electronic rejects available, BST will develop this capability in conjunction with the development of EDI 7.

Note: There are no Legal/Regulatory or Standards issues. BST understands that Timing is a major concern for AT&T, and commits to continue to try to make some form of electronic rejects available before the EDI 7 release. BST offers to support AT&T's efforts to implement this capability in addition to the continued efforts to improve the numbers of rejects and clarification information.

II. Project Plan and Timeline Agreement:

BST agrees to the concept of a joint project plan that will target a March 16, 1998 SRT/Production date with the caveats outlined above. BST understands this will not completely meet your desires in the area of directory listings and LNEs. Also, we need clarification around the LRN issues before including in a project plan.

I. Functional Requirements/Specifications:**TCIF Issue 7:**

As you know, teams from both AT&T and BST have been working together to come to closure concerning the issues on your Attachment A. Included in Attachment A of this document are BST's position on the fields in question.

On October 27, 1987, BST will deliver the draft EDI Technical Specifications and the draft LEO Implementation Guide. Then, on October 30 and 31, BST will meet with AT&T to answer questions concerning EDI Mapping, the LEO Guide, Supplements, Rejects, Edits, etc. Further, BST will be available (resources permitting) to assist AT&T in preparing their final specifications. Finally, BST will cooperate with AT&T in meeting a March 15, 1988, SRT/Production date.

Note: There are no Legal/Regulatory issues. BST and AT&T will comply with the TCIF Standards. While BST must provide non-discriminatory access to Issue 7, with BST's agreement to honor AT&T's requested schedule, there are no Timing issues.

Directory Listings:

As we understand, the planned publication date for EDI Issue 8 will be sometime in 1988. As outlined in the Georgia Agreement, SRT/Production for Directory Listings would be seven months following the publication date - which could put SRT/Production in fourth quarter, 1988, or even later. In the spirit of cooperation, BST is currently working to size requirements for the requested directory listings fields, and will make every effort to get a date as soon as possible for the directory listings improvements.

Note: There are no Legal/Regulatory issues. There are several unresolved Standards issues. Although BST cannot meet AT&T's requested 3/15/88 date, our desire is to provide this capability much earlier than our contractual obligation, because directory listing errors comprise a major portion of the clarifications sent back to AT&T. This creates a work volume problem for our centers which we would like to eliminate as quickly as possible.

Unbundled Network Elements:

The statement/issue listed in the proposal is unclear, and we would like more clarification. However, as you are aware, BST has agreed to support testing of UNEs in Kentucky and Florida. As a matter of information, RECTYP=M will be allowed in the EDI 7 release code.

Note: There are Legal/Regulatory issues that will have an impact in this area (8th Circuit Court decision). Until clarification is provided, it is unknown whether there are Standards and/or Timing concerns on this line item.

Location Position Number 5.5B1:

BST agrees that a joint review is necessary to ensure LRN ordering capability will be available. Margaret Gervin (BST) has requested Robert Oakes (AT&T) for a meeting to pursue this issue during the week of October 20, 1987.

Note: We are not far enough along in our discussions to have identified the areas of concern.



Bellsouth Interconnection Services

Facsimile

From JAN TURENS
Department AT&T Regional Account Team
Address 1980 West Exchange Place
Suite 200
Tucker, GA 30084

Telephone number 770-492-7550
Fax number 770-492-9412

To JIM CARROLL, AT&T
PAM NELSON, AT&T
Telephone number _____
Fax number 404 510 7840
510 3131

Comments

If this fax is not received in good order, please contact the sender listed above.

Date 10/24 Total number of pages 4

ATTACHMENT 40

1 BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA
2 COLUMBIA, SOUTH CAROLINA

3 HEARING #9633 JULY 8, 1997 9:00 AM.

4 DOCKET NO. 97-101-C: BELLSOUTH TELECOMMUNICATIONS, INC. - Entry into
5 InterLATA Toll Market [Section 271].

6 HEARING BEFORE: Chairman Guy Butler, Presiding; Vice Chairman Philip T. Bradley;
7 and Commissioners Rudolph Mitchell, Cecil A Bowers, Warren D. Arthur, IV, William "Bill"
8 Saunders, and C. Dukes Scott.

9 STAFF: Gary E. Walsh, Deputy Executive Director; D. Wayne Burdett, Manager, and James
10 M. McDaniel, William O. Richardson, and David S. Lacoste, Utilities Department; R. Glenn
11 Rhyne, Manager, and James E. Spearman, Research Department; F. David Butler, Esq.,
12 General Counsel; and MaryJane Cooper, Hearing Reporter.

13 BELLSOUTH COMPANIES: Harry M. Lightsey III, Esq., F. Austin, Esq., William Ellenburg,
14 Esq., and Edward Rankin, Esq., representing BELLSOUTH TELECOMMUNICATIONS,
15 INC.

16 Kevin A Hall, Esq., and Dwight F. Drake, Esq., representing
17 BELLSOUTH LONG DISTANCE, INC.

18 INTERVENORS: William R. Atkinson, Esq., Darra W. Cothran, Esq., and Carolyn C.
19 Matthews, Esq., representing SPRINT COMMUNICATIONS COMPANY, L.P.

20 John M.S. Hoefer, Esq., and Marsha A Ward, Esq., representing MCI
21 TELECOMMUNICATIONS, INC.

22 Mitchell M. Willoughby, Esq., representing SOUTH CAROLINA
23 CABLE TELEVISION ASSOCIATION.

24 Herbert Buhl, Esq., representing COMMUNICATION WORKERS OF
25 AMERICA

26 Francis P. Mood, Esq., Kenneth P. McNeely, Esq., Michael Hopkins,
27 Esq., and Steve A Matthews, Esq., representing AT&T COMMUNICATIONS OF THE
28 SOUTHERN STATES, INC.

29 Elliott F. Elam, Jr., Esq., representing CONSUMER ADVOCATE FOR
30 THE STATE OF SOUTH CAROLINA

31 Russell B. Shetterly, Jr., Esq., representing ACSI (American
32 Communications Services, Inc.).

33 Frank R. Ellerbe III, Esq., representing SOUTH CAROLINA
34 COMPETITIVE CARRIERS ASSOCIATION.

35 TRANSCRIPT OF TESTIMONY AND PROCEEDINGS
36 VOLUME 3 OF 7

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1 CHAIRMAN BUTLER: MCI?

2 MS. WARD: Thank you, Mr. Chairman

3 CROSS-EXAMINATION BY MS. WARD:

4 Q Good morning. I'm Marsha Ward.

5 A Good morning.

6 Q Mr. Stacy, I would like to follow up on a question
7 regarding TAFI and its ability to report troubles for
8 unbundled network elements. And Mr. Atkinson asked you if it
9 was like a fax, and you said that was not so; is that correct?

10 A That's correct.

11 Q What is it like? How does it work?

12 A TAFI is a computer system that uses the CLEC's discussion
13 with the customer to analyze the trouble and to attempt to
14 resolve the trouble while the CLEC is on line talking to the
15 customer. It applies a series a of rules of artificial
16 intelligence that BellSouth has developed over a number of
17 years from its own customer to try to anticipate what -- when
18 the customer describes the trouble, to try to anticipate what
19 the trouble is and take corrective action if it's possible.
20 In the case of telephone numbered services, a number of
21 corrective actions -- for instance, if a customer is suppose to
22 have call-forwarding service, and that call-forwarding service
23 has been deleted through some error in BellSouth's computer
24 systems, that omission can be corrected while the CLEC's
25 service rep is on line using TAFI. So it is an interactive

1 system to both report and correct troubles.

2 Q Now, tell me how that application would work if there is a
3 trouble with an unbundled loop?

4 A It does not apply to unbundled loops, and I did not
5 respond to that question. He asked about unbundled ports.

6 Q All right. Well, tell me how it would respond to a
7 trouble on an unbundled port?

8 A TAFI can not be used to report a trouble on an unbundled
9 loop.

10 Q Listen to my question. You said Mr. Atkinson asked you
11 about an unbundled port. Would you please tell me how TAFI
12 would work if a trouble is reported on an unbundled port?

13 A I'm sorry. I misunderstood. I thought you said
14 unbundled loop.

15 Q I said that first. You corrected me.

16 A Sorry.

17 Q I'll go with your example.

18 A On an unbundled port, an unbundled port looks no differently
19 to the TAFI system than a telephone number which is not hooked
20 up to a loop. It has all the characteristics of a central
21 office telephone number. The trouble is reported, analyzed
22 and managed the same way.

23 Q So it's totally electronic?

24 A It is totally electronic unless some manual work has to be
25 done in the central office to resolve the problem, just as it

1 would for a BellSouth subscriber who had a problem with a
2 piece of central office equipment.

3 Q So the information is entered into TAFI, and it's handled
4 completely electronically as it relates to an unbundled port?

5 A Up until the point of physical work being required at the
6 end of the trouble.

7 Q Is there any other unbundled network element that TAFI can
8 be utilized totally electronically?

9 A Any of the unbundled elements that are associated with a
10 telephone number, and there are several of those that have
11 telephone numbers associated in combinations of elements. But
12 the port is the most common.

13 Q Give me another example, then. Would a loop be associated
14 with a number?

15 A Not unless they have been recombined, and then in this
16 state's order, they look like a resold service and are treated
17 as a resold service. In that case, it does. Normally, an
18 unbundled loop is just a loop, and the CLEC has the chance to
19 connect to that to their own switch or to take it and do
20 anything with it that's legal within the bounds of the
21 agreement.

22 Q So the port is actually the only unbundled network element
23 that TAFI can be used for trouble reporting?

24 A The port and the variety of ports that are available -- 2R
25 ports, PBX trunk ports that have numbers assigned to them, ISDN

1 ports that have numbers assigned to them, all of the varieties
2 of switchboards.

3 Q But no loops?

4 A No loops that are not associated with the telephone number.

5 Q No switches? Unbundled switch?

6 A Unbundled switch is not exactly a network element. There
7 is unbundled switching transport that we offer as a network
8 element.

9 Q How about that, then?

10 A That capability cannot be tested through TAFI.

11 Q Okay. What about dark fiber?

12 A Cannot be tested through TAFI.

13 Q What about signaling?

14 A Signaling associated with the local port can and is tested
15 through TAFI. Signaling associated with the network is taken
16 as a trouble on another interface and is tested exactly the
17 same as it is for the interexchange carrier today through an
18 access carrier testing center.

19 Q Okay, thank you. I'm sure you appreciate the fact that
20 Ms. Calhoun deferred a few questions that I asked of her
21 yesterday to you. So let me go back over with you a couple of
22 things that I discussed with Ms. Calhoun, and I would like to
23 get your response, please.

24 A Okay.

25 Q Ms. Calhoun stated in her prefiled testimony, Mr. Stacy,

1 Q Any more CLECs other than 4 utilizing EDI in the BellSouth
2 region?

3 A There are not at this time.

4 Q The testing that you've done -- the volume testing for
5 LENS, did you do both resale and unbundled network elements?

6 A Yes. That's correct.

7 Q Okay. And the unbundled network elements, how are they
8 ultimately processed? Do they have to go through a manual
9 processing?

10 A Yes, they do. As Jane began to describe, the unbundled
11 network element, similar to some of our other complex
12 services, is a service that BellSouth does not provision
13 entirely without human intervention yet. So those orders flow
14 through to the local carrier test center, they are analyzed and
15 handled by an expert service rep, and then are placed
16 immediately into the proper BellSouth systems. We have taken
17 the ordering volumes that the CLECs gave us earlier in this
18 year and last year and put the highest volumes of services in
19 the electronic flow-through mode. And those volumes were
20 dictated for the resale services. As you might know, from some
21 of our other filings, we have over 50,000 resold services in
22 service throughout the BellSouth region and a little over 2,000
23 unbundled loops. So we've concentrated on the high volume
24 services, as far as mechanizing and making them flow through.
25 I've been responsible for the project for producing the

ATTACHMENT 41

ATTACHMENT 41

"Corrections and Enhancements" Needed To LENS, As Described By BellSouth Personnel in May 1997, and Current Status As Known By AT&T

Correction/Enhancement	Status
Display of Correct RSAG Community Name	Corrected
Full Availability of Hunting Options	Unavailable
Access to Customer Service Records	Available (excluding Louisiana)
Display of RSAG Street Directional	Corrected
On-line Edits for Content	Unavailable
Directory Listing Options	Unavailable
Information on Directory Book Identification and Book Close Dates	Unavailable
FIDs (Feature Identifiers) On-line	Unavailable
Network Elements and Combinations	Unavailable
Complex Orders - SynchroNet, ISDN, etc.	Unavailable
Ability to Change a Pending Order	Unavailable
Typing Input for PIC Selection	Available - Firm Order Mode Only
Reserve More Than 6 Numbers / Place Orders for More Than 6 Lines	Unavailable
Multiline Hunt Groups	Unavailable
Larger Number of Services/Features Available for Mechanized Ordering	Partially Corrected
On-line Check for Compatibility of Features Selected	Unavailable
Typing Input for Services/Features	Unavailable
Flexible Reservation Period for Numbers	Unavailable
Ability to Request Specific Quantity of Numbers in Sequence	Unavailable
UNEs and Combinations on a Single Order	Unavailable
ZIP Codes	Corrected
Conforming Format for Date Input	Unavailable
Access to Status Information on EDI Orders	Unavailable
Ability to Select Alternative Address as Displayed by RSAG	Unavailable
Correct Need to "Reset" to Obtain Valid RSAG Addresses When Correcting Inputs	Corrected
Display of Carrier Name with Selected PIC Code	Unavailable

Correction/Enhancement	Status
Select Services and Features for All Lines In One Pass	Available if Selected Before Making First Selection
Expanded Pre-population of Identification Fields from User/Company Profile	Limited

ATTACHMENT 42

ATT Measurements
Attachment 12 Section 2
Firm Order Confirmation

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
1																
2	Item 2.4 August Data															
3	DAY	LSR	<4HR	%<4HR	4-8HR	%4-8HRS	8-12HR	%8-12HR	12-16HR	%12-16HR	16-20HR	%16-20HR	20-24HR	%20-24HR	<24HR	%<24HR
4	01	50	3	6%	5	10%	1	2%							9	18%
5	04	65	25	38%	2	3%	1	2%	11	17%	4	6%	4	6%	47	72%
6	05	52	31	60%	2	4%	4	8%	1	2%	2	4%	1	2%	41	79%
7	06	128	75	59%							6	5%	14	11%	95	74%
8	07	100	40	40%					1	1%					41	41%
9	08	78	24	31%											24	31%
10	11	47	13	28%			1	2%	10	21%	5	11%	2	4%	31	66%
11	12	111	36	32%	16	14%	3	3%	5	5%	25	23%	4	4%	89	80%
12	13	107	37	35%	4	4%	4	4%	10	9%	16	15%	21	20%	92	86%
13	14	106	30	28%							4	4%	26	25%	60	57%
14	15	68	3	4%					2	3%	1	1%	14	21%	20	29%
15	16	8	4	50%			1	13%	1	13%					6	75%
16	19	174		0%	9	5%	4	2%	27	16%	21	12%	6	3%	67	39%
17	20	94	28	30%											28	30%
18	21	90	17	19%			6	7%	7	8%	29	32%	3	3%	62	69%
19	22	88	38	43%	11	13%			10	11%	3	3%	2	2%	64	73%
20	23	649	385	59%	18	3%					4	1%	19	3%	426	66%
21	24	16	5	31%					3	19%	3	19%			11	69%
22	25	169	74	44%	13	8%	1	1%	1	1%	41	24%	12	7%	142	84%
23	26	529	191	36%	66	12%	22	4%	15	3%			40	8%	334	63%
24	27	500	255	51%	2	0%			2	0%					259	52%
25	28	240	91	38%	10	4%			1	0%	1	0%			103	43%
26	29	595	326	55%	20	3%			8	1%			36	6%	390	66%
27	30	255	136	53%	3	1%	1	0%	6	2%			48	19%	194	76%
28	31	103	54	52%	3	3%			2	2%	16	16%	12	12%	87	84%
29	TOT	4422	1921	43%	184	4%	49	1%	123	3%	181	4%	264	6%	2722	62%
30																

ATT Measurements
Attachment 12 Section 2
Error or Reject Status

Item 2.5 August Data

Company Code	Total Errors	Errors Notified within 1 hour	% Notified within 1 hour
7421	612	35	6%